

LIPMAN & BOOTH, LLP
ATTORNEYS AT LAW

CHRISTOPHER BOOTH
NOAH LIPMAN (OF COUNSEL)*

11 BROADWAY, SUITE 967
New York, New York 10004
TEL: (212) 363-6969
FAX: (212) 363-6041

January 15, 2008

The Hon. Gerard E. Lynch
United States District Court
Southern District of New York
500 Pearl Street
New York, New York
VIA E.C.F.

Re.: **United States v. Michael Bass**
07 Cr. 887 (GEL)

Dear Judge Lynch:

Please accept this submission as a request to modify Michael Bass' bail conditions to permit travel to New Jersey on January 20, 27 and February 9, 2008.

At the present, the defendant's travel is limited to the local Districts in New York. He has asked his pre-trial officer U.S.P.O. Xiomara Rojas for permission to travel and she advised him to make this request to Your Honor.

The defendant wishes to travel to New Jersey on January 20, 27 and February 9 2008 to attend his daughter Jahnai Bass' cheerleading competition. She has asked the defendant to accompany her to provide support in her endeavor. She has a close relationship with the defendant and he similarly wants to accompany her for that purpose.

I left voice mail messages and have faxed this request to both A.U.S.A. Marissa Mole and U.S.P.O. Xiomara Rojas and have no reason to believe that either party objects to this request.

Wherefore, the Court is respectfully asked to permit the defendant to travel to New Jersey on January 20, 27 and February 9, 2008 returning to his home in New York on each date.

Respectfully Submitted,

Christopher Booth
Attorney For Michael Bass